



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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September 26, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: ***WC Dkt. No. 12-63: Joint Petition of Price Cap Holding Companies for Conversion of Average Schedule Affiliates to Price Cap Regulation and Limited Waiver Relief***

Dear Ms. Dortch:

On September 24, 2012, Mike Shultz and Scott Kitchen of Consolidated Communications and Russell M. Blau representing Consolidated Communications; Malena Barzilai and Tim Loken of Windstream Communications; and Ken Mason, Kevin Clinefelter, Carl Yastremski and the undersigned of Frontier Communications met with the following members of the Wireline Competition Bureau ("WCB"): Victoria Goldberg, Doug Slotten, Pam Arluk, Dick Kwiatkowski and Christopher Koves.

The meeting focused on WCB staff providing preliminary feedback on the rate worksheet that the companies had jointly filed on July 16, 2012.¹ In particular, WCB staff questioned Frontier and Windstream on how the percentage reductions used to set the rates specified in the worksheet may have shifted the companies' relative revenues among categories such as switched and special access. In response to these questions Frontier (Attachment A) and Windstream (Attachment B) submit two new data worksheets that further detail the companies' preexisting rates and demand broken out by rate elements. These worksheets demonstrate that the relative revenues have not been shifted as a result of the proposed rates.

The participants also discussed the implications upon the companies' ability to charge an Access Recovery Charge (ARC) upon conversion to price cap regulation and how that could fit in with a company's decision to calculate the ARC at a holding company level.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter and the attached worksheets are being filed electronically with your office today.

Please feel free to contact me with any further questions.

¹ See Letter from Michael D. Saperstein, Jr., Frontier Communications, to Marlene H. Dortch, FCC, WC Dkt. No. 12-63 at Attachment 1 (filed Jul. 16, 2012).

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Victoria Goldberg
Doug Slotten
Pam Arluk
Dick Kwiatkowski
Christopher Koves